

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

CITY OF DETROIT, MICHIGAN,

Debtor.

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Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

**MICHIGAN COUNCIL 25 OF THE AMERICAN FEDERATION OF
STATE, COUNTY & MUNICIPAL EMPLOYEES, AFL-CIO AND SUB-
CHAPTER 98, CITY OF DETROIT RETIREES' S RESPONSE
REGARDING THE DETROIT RETIREMENT SYSTEMS' STATEMENT
OF RESERVATION OF RIGHTS WITH RESPECT TO THE SIXTH
AMENDED PLAN FOR THE ADJUSTMENT OF DEBTS OF THE
CITY OF DETROIT**

The Michigan Council 25 of the American Federation of State, County & Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees (collectively, "**AFSCME**"), through its counsel, files this response regarding *The Detroit Retirement Systems' Statement of Reservation of Rights With Respect to the Sixth Amended Plan for the Adjustment of Debts of the City of Detroit* [Docket No. 7052] (the "**GRS Reservation of Rights**") and respectfully states as follows:

RESPONSE

1. The GRS Reservation of Rights references certain ongoing negotiations (the “**Ongoing Negotiations**”) regarding the terms of the GRS Pension Restoration,¹ the Restoration Trust Agreement, and the State Contribution Agreement, among other things.

2. As the Court is aware, Classes 10, 11 and 12 voted in favor of the Fourth Amended Plan for the Adjustment of Debts of the City of Detroit, dated May 5, 2014 [Docket No. 4392] (the “**Fourth Amended Plan**”). To the extent that the Ongoing Negotiations result in modifications to the treatment under Classes 10, 11 or 12 of the Fourth Amended Plan as voted on, AFSCME reserves the right to review that treatment and to determine whether or not the modifications impair the rights of AFSCME current or retired employees.

3. Additionally, AFSCME reserves the right to object to any further amendments and supplements to or versions of the Plan as well as any freestanding motions to the extent impacting the treatment of AFSCME current or retired employees.

Dated: August 26, 2014

LOWENSTEIN SANDLER LLP

By: /s/ Sharon L. Levine

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Sixth Amended Plan for the Adjustment of Debts of the City of Detroit, dated August 20, 2014 [Docket No. 6908].

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CERTIFICATE OF SERVICE

The undersigned certifies that on August 26, 2014, the foregoing document was filed with the Clerk of the Court using the CM/ECF system, which provides electronic notification of such filing to all counsel of record.

Dated: August 26, 2014

/s/ Philip J. Gross

Philip J. Gross

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